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October 13, 2010

VIA E-MAIL
& FACSIMILE

Krishnan Chittur, Esq.
Keith Altman, Esq.
c/o Chittur & Associates PC
286 Madison Avenue
Suite 1100
New York, NY 10017

Re: *Melinda Serin, et al. v. Northern Leasing Systems, Inc., et al.,*
Index No. 06 Civ. 1625 (JSG)

Kris and Keith:

In light of plaintiffs' witness list, we intend to subpoena the following individuals for deposition: Stephen Turner, Jaya Patel and Natalia Russ. Will you accept service on their behalf? Please let us know either way. We would like to schedule them during the week of October 18th.

We also would like to depose plaintiffs' expert, Stan Smith, on Friday, October 25th, assuming that the 7 reports, designated by Defendants, authored by Mr. Smith from prior cases in which he has served as an expert, are produced on or before Monday, October 18th, per the Court's Order of October 6th.

Also, it appears that number of depositions noticed on behalf of plaintiffs exceeds the number permitted without leave of court under Rule 30(a) of the Federal Rules of Civil Procedure. Thus far, plaintiffs have noticed two 30(b)(6) depositions (one for the custodian of records, another for NLS), along with the depositions of Jay Cohen, Richard Hahn, Sara Krieger, Joseph Sussman, Sam Buono, Ricardo Brown, Lina Kravic, Neil Herzman, Robert Taylor, Ariel Schecter, Deepika Shahani and Cortes Derussy. That is 14 depositions. You are limited to 10. As of today, the remaining schedule looks as follows:

Wednesday, October 14th – Sam Buono; Tuesday, October 19th – Richard Hahn; Monday, October 25th – Lina Kravic, Neil Herzman, Robert Taylor (subject to their availability); Tuesday,

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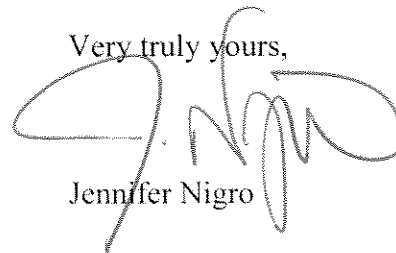
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October 26th – Sara Krieger (individual and as corporate designee for NLS); Ricky Brown – TBD (per your request we will not be producing him tomorrow after Mr. Buono's deposition).

The foregoing depositions, coupled with the first 30(b)(6) (custodian of records) and yesterday's deposition of Mr. Sussman, totals 10. The depositions of Ariel Schecter, Deepika Shahani and Cortes Derussy, noticed for Wednesday, October 27th, and the deposition of Jay Cohen, scheduled for Thursday, October 28th are outside the limited number of depositions without leave of court under the Rules.

Please let me know which of the above-named deponents (who have not already been deposed) should be removed from the calendar.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Jennifer Nigro', with a large, stylized initial 'J'.

Jennifer Nigro

Cc: Robert D. Lillienstein